



west virginia department of environmental protection

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Jim Justice, Governor
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Evaluation Memo

Application Number: R13-2346D
Facility ID Number: 039-00051
Name of Applicant: Dominion Transmission, Inc. (Dominion)
Name of Facility: Cornwell Station
Latitude/Longitude: 38.48650/-81.27290
Application Type: Class II Administrative Update
Submission Date: November 28, 2016
Applicant Ad Date: December 8, 2016
Applicant Ad Newspaper: *Charleston Gazette-Mail*
Complete Date: January 9, 2017
Due Date: March 10, 2017
Engineer: Joe Kessler

The Cornwell Station is a large natural gas production and transmission facility located approximately 4.10 miles east of Clendenin, Kanawha County, WV just south of Elk River along River Haven Road. The existing facility has a 23 mmscf/day glycol dehydration unit (GDU) on the production side of the facility and thirteen (13) compressor engines on the transmission side of the facility.

Description of Proposed Changes

On November 28, 2016, Dominion submitted a Class II Administrative Update (A/U) primarily to permit number R13-2346C to remove the requirements for major sources of Hazardous Air Pollutants (HAPs) under 40 CFR 63, Subpart HH and replace them with the applicable areas source requirements under Subpart HH. Dominion also requested several changes to correct other minor issues with the existing permit. No physical changes were proposed as part of this permitting action.

Estimate of Emissions

Dominion is not requesting any increase in emissions as a result of the proposed changes discussed above.

Regulatory Applicability

40 CFR 63, Subpart HH: National Emission Standards for Hazardous Air Pollutants From Oil and Natural Gas Production Facilities

Dominion's Cornwell Compressor Station has separate equipment that services a natural gas production gathering pipeline system and a transmission pipeline system. The GDU and associated control device are located on the production side of the facility. For purposes of permitting, the entire facility is considered "one source." Therefore, emissions from the entire facility are aggregated to determine Title V and New Source Review (NSR) program applicability. This methodology is the same for determining when a source is defined as a major source of HAPS as given under the definition in §63.2.

However, under Subpart HH, the definition of a major source has an exception:

§63.761

Major source, as used in this subpart, shall have the same meaning as in §63.2, except that:

- (1) Emissions from any oil or gas exploration or production well (with its associated equipment, as defined in this section), and emissions from any pipeline compressor station or pump station shall not be aggregated with emissions from other similar units to determine whether such emission points or stations are major sources, even when emission points are in a contiguous area or under common control;
- (2) Emissions from processes, operations, or equipment that are not part of the same facility, as defined in this section, shall not be aggregated; and
- (3) For facilities that are production field facilities, only HAP emissions from glycol dehydration units and storage vessels shall be aggregated for a major source determination. For facilities that are not production field facilities, HAP emissions from all HAP emission units shall be aggregated for a major source determination.

Based on the definition of a "major source" in Subpart HH, the production side of the Cornwell Compressor station meets the definition of an area source and the applicability requirements of §63.760. Pursuant to §63.760(b)(2), each TEG GDU located at an area source that meets the requirements under §63.760(a)(3) is defined as an affected facility under Subpart HH. The requirements for affected sources at area sources are given under §63.764(d). However, for a GDU, exemptions to these requirements are given under §63.764(e): if (1) "actual annual average flowrate of natural gas to the glycol dehydration unit is less than 85 thousand standard cubic meters [3 mmscf/day] per day" or (2) "actual average emissions of benzene from the glycol dehydration unit process vent to the atmosphere are less than 0.90 megagram [1 TPY] per year."

Information in the permit indicates the maximum aggregate potential-to-emit (PTE) of benzene emissions from the GDU is less than 1 TPY. Therefore, the GDU is exempt from the Subpart HH requirements given under §63.764(d).

45CSR13: Permits for Construction, Modification, Relocation and Operation of Stationary Sources of Air Pollutants, Notification Requirements, Administrative Updates, Temporary Permits, General Permits, and Procedures for Evaluation

The proposed changes to the Cornwell Compressor Station will not increase the PTE of any regulated pollutant. Therefore, pursuant to §45-13-4.2(b)(1), Dominion is requesting a Class II Administrative Update to make a "[c]hange in a permit condition as necessary to allow changes in operating parameters, emission points, control equipment or any other aspect of a source which results in an increase or no change in the emission of any existing regulated air pollutant or any new regulated air pollutant."

As required under §45-13-8.3 ("Notice Level A"), Dominion placed a Class I legal advertisement in a "newspaper of general circulation in the area where the source is . . . located." The ad ran on December 8, 2016 in the *Charleston Gazette-Mail* and the affidavit of publication for this legal advertisement was submitted on January 9, 2017.


Changes to Permit R13-2346C

Substantive changes to the permit are limited to the following:

- Removal of all references to the 40 CFR 63, Subpart HH requirements relating to major sources of HAPs (including Appendix A) and instead replacing them with the Subpart HH area source requirements under 5.1.5(a) through (f);
- Removal of the duplicate language under 5.4.2. of the permit; and
- Modification of the language under 6.4.1. of the permit to require certification prior to submission of records rather than during the maintenance of records.

Recommendation

The information provided in the permit application indicates that compliance with all applicable state and federal air quality regulations will continue to be achieved. Therefore, I recommend the issuance of the Class II Administrative Update R13-2346D to Dominion Transmission, Inc. for the changes outlined above.



Joe Kessler, PE
Engineer

2/03/17

Date